

ENFORCEMENT
SENSITIVE

AK 0701
11/29/05
He → le

RCRA Inspection Summary
EPA Region 10

Inspection Information		
Site Name Flint Hills Resources Alaska	RCRA ID No. AKD 000850701	
Type of Inspection CEI	Inspection Date June 17, 2004	
<input type="checkbox"/> Inspection Summary Only	<input checked="" type="checkbox"/> Inspection Report Attached	
<input type="checkbox"/> ICDS Form Attached Previously submitted		
Recommendations (use separate sheet if necessary)		
1 (a). Violations and citations		
1 (b). Issues/concerns/comments		
Comment: The inspection was conducted in June 2004 and the report was not finalized until August 2005. The observations noted during the inspection should be viewed in a subsequent inspection at the facility. No further action is necessary at this time.		
2. Recommended Enforcement Follow-up (check all that apply)		
<input type="checkbox"/> No Action letter <input type="checkbox"/> 3007 <input type="checkbox"/> Referral to State <input type="checkbox"/> NOV		
<input type="checkbox"/> Formal Enforcement <input type="checkbox"/> Criminal <input type="checkbox"/> DOJ		
<input checked="" type="checkbox"/> Other Action: Recommend for inspection in FYI 2006 to verify corrections to observation noted in this report.		
3. SNC Recommendation (circle choice) Yes <u>No</u>		
PRINT Inspector Name Bruce Long	Inspector Signature <i>Bruce Long</i>	Date Signed August 30, 2005
Management Decision/ Comments		
Manager's Decision		
<input type="checkbox"/> This handler is <u>not</u> a SNC		
<input checked="" type="checkbox"/> Send to File no further action necessary		
<input type="checkbox"/> Compliance Analysis Assignment to:		
Manager's Comments <i>All inform HQ & all prog g RCRA inspection</i>		
<i>STARTED since all data b/w date by 12/1/05</i>		
Manager's Signature <i>Betty Huie</i>		Date 11/29/05

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**EPA Region 10
RCRA Compliance Inspection Report
Section A**

Inspection Information

Handler Name: Flint Hills Resources Alaska North Pole Refinery

Handler ID Number: AKD 00085 0701

Inspection Date: June 17, 2004

Inspection Type: CEI

Inspection Team: Diane Richardson, USEPA Alaska Operations Office
and Bruce Long, USEPA Oregon Operations Office

Site Contact Information

Site Contact Name/Title: David Guinn, Environmental Manager

Site Location Address: 1100 H & H Lane North Pole, AK 99705

Site Mailing Address: 1100 H & H Lane North Pole, AK 99705

Site Phone Number: (907) 488-0033

Site Fax Number:

Report Information

Report Start Date: September 30, 3005

Date Report Completed: August 30, 3005

Report Author Name (print): Bruce Long

Report Author Signature: _____

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

EPA Region 10 Extract Flag: X Facility Identifier: County: FAIRBANKS NORTH STAR

Universes	Full Enforcement: ----	Subj CA: X	Perm Prgrs: L--S-	Op Pmt GPRA:
Generator: LQG	Operating TSDF: ----	Subj CA TSD 3004:	Perm Wrkld: ----	PClos GPRA:
Transporter:	BOYSNC:	Subj CA TSD Discr: X	Clos Wrkld: ----	CA GPRA:
	SNC:	Subj CA Non-TSD:	Pclos Wrkld: ----	CA HE EI:
	Annual BOY Enf:	CA Wrkld: X	Controls in Place: No	CA GW EI:

Activity Location: AK Source Type: Notification Seq. Number: 4 Receive Date: 01 APR 2004

Other/Previous Site Name: FLINT HILLS RESOURCES NORTH POLE REFINRY

Location 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing Address: 1100 H & H LN
NORTH POLE, AK 99705
UNITED STATES

Contact Person BRIAN K. ROOS 1100 H & H LN
For Source (907) 488-0033 NORTH POLE, AK 99705
Information BRIAN.ROOS@FHR.COM UNITED STATES

Owner (current) 1100 H & H LANE Type: Private
FLINT HILLS RESOURCES ALASKA LLC NORTH POLE, AK 99705
From: 04/01/2004 To: NORTH POLE Phone:

Owner (current) 1100 H & H LN Type: Private
WILLIAMS ALASKA PETROLEUM INC NORTH POLE, AK 99705
From: 08/18/1977 To: 04/01/2004 NORTH POLE Phone: (907) 488-2741

Operator (current) Type: Private
FLINT HILLS RESOURCES ALASKA LLC
From: 04/01/2004 To: Phone:

Land Type: State Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: 0 State District:

NAICS Codes: 32411 Petroleum Refineries

Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01. 2003 BR LQG, OSE 4/23/04. CHANGED NAME OF SITE & CONTACT DUE TO CHANGE OF OWNERSHIP PER LTR 4/17/04. OSE 4/23/04.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator

Transfer Facility: No

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Importer Activity: No

Transporter: No

Used Oil Fuel Marketer Activity

Mixed Waste Generator: No

Transfer Facility: No

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

Transporter Activity: No

Used Oil Processor and/or
Re-refiner Activity

TSD Activity: No

Processor: No
Refiner: Yes

Marketer who first claims the used
oil meets the specifications: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No

Underground
Injection Control: No

Smelting, melting, Refining Furnace
Exemption: No

Destination Facility for
Universal Waste: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D018, D035, D039, D040, F002, F003, F005, F037, K050, K169

Activity Location: AK Source Type: Notification Seq. Number: 3 Receive Date: 01 MAR 2004

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing Address: 1100 H & H LN
NORTH POLE, AK 99705
UNITED STATES

Contact Person KATHLEEN M. MCCULLOM 1100 H & H LN
For Source (907) 488-0033 NORTH POLE, AK 99705
Information KATHLEEN.MCCULLOM@WILLIAMS.COM UNITED STATES

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Owner (current)
WILLIAMS ALASKA PETROLEUM INC
From: 08/18/1977 To: 1100 H & H LN
NORTH POLE, AK 99705
Type: Private
Phone: (907) 488-2741

Land Type: State Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: 0 State District:
NAICS Codes: 32411 Petroleum Refineries

Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01. 2003 BR LQG, OSE 4/23/04.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator

Transfer Facility:

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: No
Mixed Waste Generator: No

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No
TSD Activity: No
Recycler Activity: No

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

No

Processor: No
Refiner: Yes

Marketer who first claims the used
oil meets the specifications:

No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
Smelting, melting, Refining Furnace
Exemption: No

Underground
Injection Control:

No

Destination Facility for
Universal Waste:

No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D018, D035, D039, D040, F002, F003, F005, F037, K050, K169

Activity Location: AK Source Type: Biennial Report Seq. Number: 6 Receive Date: 27 FEB 2004 Report Cycle: 2003

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing 1100 H & H LN
Address: NORTH POLE, AK 99705
UNITED STATES

Contact Person KATHLEEN M. MCCULLOM UNITED STATES
For Source (907) 488-0033
Information KATHLEEN.MCCULLOM@WILLIAMS.COM

Owner (current)
STATE OF ALASKA
From: 08/18/1977 To: 1100 H & H LN
NORTH POLE, AK 99705
Type: State
Phone:

Operator (current)
WILLIAMS ALASKA PETROLEUM, INC.
From: 08/18/1977 To: Type: Private
Phone:

Land Type: State Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: State District:
NAICS Codes: 32411 Petroleum Refineries

RCRA Site Detail

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Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator

Transfer Facility:

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: No

Transporter: No

Used Oil Fuel Marketer Activity

Mixed Waste Generator: No

Transfer Facility: No

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

No

Transporter Activity: No

Used Oil Processor and/or
Re-refiner Activity

TSD Activity: No

Processor: No

Marketer who first claims the used
oil meets the specifications:

No

Recycler Activity: No

Refiner: Yes

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No

Underground

Destination Facility for

Smelting, melting, Refining Furnace

Injection Control: No

Universal Waste:

Exemption: No

No

Universal Waste Activities:

Description

Generated

Accumulated

Batteries

N

N

Lamps

N

N

Pesticides

N

N

Thermostats

N

N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D018, D035, D039, D040, F002, F003, F005, F037, K050, K169

Biennial Report Information

Total Quantity Reported (Tons): Generated: 43 Managed: 0 Shipped: 43 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated

Managed

Onsite Management Methods

Shipped

Offsite Management Methods

SULFOLANE WITH BENZENE

9

0

9 H061 - FUEL BLENDING

EPA Waste Codes: D018

OIL/WATER/SOLIDS SEPARATOR SLUDGE

5

0

5 H040 - INCINERATION

EPA Waste Codes: F037

K050 - CONTAMINATED DEBRIS

3

0

3 H040 - INCINERATION
H132 - LANDFILL OR SURFACE
IMPOUNDMENT

EPA Waste Codes: K050

SPENT FILTERS CONTAMINATED WITH BENZENE

2

0

2 H141 - STORAGE, BULKING AND/OR
TRANSFER OFF SITE

EPA Waste Codes: D018

ACTIVATED CARBON POWDER FROM AIR POLLUTION CONTROL DEVICE

2

0

2 H061 - FUEL BLENDING

EPA Waste Codes: D001, D018

FLOATING ROOF SEAL FROM PETROLEUM TANK

2

0

2 H040 - INCINERATION

EPA Waste Codes: D001, D018

MISCELLANEOUS REFINERY SLUDGES FROM MAINTENANCE ACTIVITIES

2

0

2 H141 - STORAGE, BULKING AND/OR
TRANSFER OFF SITE

EPA Waste Codes: D018, F037, K050

ETHYLENE GLYCOL W/ BENZENE FROM AIR POLLUTION CONTROL DEVICE

2

0

2 H061 - FUEL BLENDING

EPA Waste Codes: D018

PROPYLENE GLYCOL SLUDGE (SOLIDS FROM FILTERING GLYCOL)

1

0

1 H040 - INCINERATION

EPA Waste Codes: D018

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
1	0	SLUDGE WITH BENZENE FROM UNLISTED SOURCES AND PROCESSES		1 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE

EPA Waste Codes: D018

Activity Location: AK Source Type: Notification Seq. Number: 2 Receive Date: 11 DEC 2001

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing Address: 1100 H & H LN
NORTH POLE, AK 99705

Contact Person KATHLEEN MCCULLOM 1100 H & H LN
For Source (907) 488-0033 NORTH POLE, AK 99705
Information

Owner (current) 1100 H & H LN Type: Private
WILLIAMS ALASKA PETROLEUM INC NORTH POLE, AK 99705
From: 08/18/1977 To: Phone: (907) 488-2741

Land Type: State Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

TSD Activity: No

Processor: No
Refiner: Yes

Marketer who first claims the used
oil meets the specifications: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Underground Injection Control: No Destination Facility for
Universal Waste:

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D006, D007, D008, D009, D011, D018, D035, D039, D040, F003, F005, F037, K050, K169

Activity Location: AK Source Type: Biennial Report Seq. Number: 5 Receive Date: 29 NOV 2001 Report Cycle: 2001

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location 1100 H & H LN
Address: NORTH POLE
NORTH POLE, AK 99705

Mailing Address: 1100 H & H LN
NORTH POLE, AK 99705
UNITED STATES

Contact Person KATHLEEN M. MCCULLOM
For Source (907) 488-0033 UNITED STATES
Information

Owner (current) Type: Private
WILLIAMS ALASKA PETROLEUM, INC
From: To: Phone:

Operator (current) Type: Private
WILLIAMS ALASKA PETROLEUM, INC
From: To: Phone:

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

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Land Type: State Non Notifier: No Commercial Availability: Unknown Tsd Date:
 Accessibility: No. Employees: 0 State District:

NAICS Codes: 32411 Petroleum Refineries

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator

Transfer Facility:

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Importer Activity: No
 Mixed Waste Generator: No

Transporter: Unknown
 Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or
 Re-refiner Activity

Marketer who directs shipment
 off-specification used oil to
 off-specification used oil burner: Unknown

TSD Activity: No

Recycler Activity: Unknown

Processor: Unknown
 Refiner: Yes

Marketer who first claims the used
 oil meets the specifications: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
 Smelting, melting, Refining Furnace
 Exemption: Unknown

Underground
 Injection Control: Unknown Destination Facility for
 Universal Waste: Unknown

Universal Waste Activities:

Description	Generated	Accumulated
Batteries	U	U
Lamps	U	U
Pesticides	U	U
Thermostats	U	U

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D006, D007, D008, D009, D011, D018, D035, D039, D040, F003, F005, K050, K169

Biennial Report Information

Total Quantity Reported (Tons): Generated: 130 Managed: 0 Shipped: 130 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
HEAT EXCHANGER SLUDGE				
33	0		33	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: K050				
SULFOLANE WITH BENZENE				
20	0		20	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D018				
SLUDGE WITH CHROMIUM				
12	0		12	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D007				
GRAVEL CONTAMINATED WITH HEAT EXCHANGER SLUDGE				
7	0		7	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: K050				
SOIL/ROCKS/SAND WITH SULFOLANE AND BENZENE				
6	0		6	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D018				
PPE CONTAMINATED WITH HEAT EXCHANGER SLUDGE				
4	0		4	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: K050				
SLUDGE WITH BENZENE				
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D018				

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
PPE CONTAMINATED WITH OIL/WATER/SOLIDS SEPARATOR SLUDGE	1	0		1 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F037				
USED KEROSENE SOLVENT	1	0		1 H061 - FUEL BLENDING
EPA Waste Codes: D008, D018				
PROPYLENE GLYCOL SLUDGE	0	0		0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D018				

Activity Location: AK Source Type: Biennial Report Seq. Number: 4 Receive Date: 02 NOV 1999 Report Cycle: 1999

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM NORTH POLE

Location 1100 H & H LANE
Address: NORTH POLE, AK 99705

Mailing 1100 H & H LANE
Address: NORTH POLE, AK 99705

Contact Person KATHLEEN M MCCULLOM
For Source (907) 488-0033
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 32411 Petroleum Refineries

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown
TSD Activity: No
Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown
Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Used Oil Processor and/or Re-refiner Activity
Processor: Unknown
Refiner: Unknown
Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown
Destination Facility for Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 119,022 Managed: 610,285 Shipped: 13 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
OILY WATER, SEPARATOR SLUDGE	4	0		4 H040 - INCINERATION H050 - ENERGY RECOVERY
EPA Waste Codes: D001, F037				
OILY WATER, SEPARATOR SLUDGE WITH REGULATED SULFIDES	2	0		2 H040 - INCINERATION
EPA Waste Codes: D001, D003, F037				
SULFOLANE WITH BENZENE	2	0		2 H050 - ENERGY RECOVERY
EPA Waste Codes: D018				

RCRA Site Detail

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Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)				
Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
PETROLEUM REFINERY HEAT EXCHANGER SLUDGE				
2	0			2 H040 - INCINERATION
EPA Waste Codes: K050				
FLOURESCENT LIGHT TUBES WITH MERCURY				
1	0			1 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: D009				
SLUDGE WITH BENZENE				
1	0			1 H040 - INCINERATION
EPA Waste Codes: D018				
USED KEROSENE (USED FOR WASHING PARTS)				
0	0			0 H050 - ENERGY RECOVERY
EPA Waste Codes: D008, D018				
USED PETROLEUM COALESCING FILTERS				
0	0			0 H040 - INCINERATION
EPA Waste Codes: D018				
PPE CONTAMINATED WITH HEAT EXCHANGER SLUDGE				
0	0			0 H040 - INCINERATION
EPA Waste Codes: K050				
FILTERS CONTAMINATED WITH WASTE SULFOLANE & BENZENE				
0	0			0 H040 - INCINERATION
EPA Waste Codes: D018				

Activity Location: AK Source Type: Notification Seq. Number: 1 Receive Date: 12 FEB 1999

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing 1100 H & H LN
Address: NORTH POLE, AK 99705

Land Type: State Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility:	Unknown	Used Oil Activities		
Other Hazardous Waste Generator Activities		Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	Unknown	Transporter:	No	
Mixed Waste Generator:	Unknown	Transfer Facility:	No	Used Oil Fuel Marketer Activity
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity		Marketer who directs shipment off-specification used oil to off-specification used oil burner:
TSD Activity:	No	Processor:	No	No
Recycler Activity:	No	Refiner:	No	Marketer who first claims the used oil meets the specifications:
Exempt Boiler and/or Industrial Furnace				No
Small Quantity Onsite Burner Exemption:	Unknown	Underground Injection Control:	No	Destination Facility for Universal Waste:
Smelting, melting, Refining Furnace Exemption:	Unknown			

Activity Location: AK Source Type: Biennial Report Seq. Number: 3 Receive Date: 14 NOV 1997 Report Cycle: 1997

Other/Previous Site Name: MAPCO NORTH POLE REFINERY

Location 1100 H&H LANE
Address: NORTH POLE, AK 99705

Mailing 1100 H&H LANE
Address: NORTH POLE, AK 99705

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Contact Person KATHLEEN MCCULLOM
For Source Information (907) 488-0033

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:
NAICS Codes: 32411 Petroleum Refineries

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown
TSD Activity: No
Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Processor and/or Re-refiner Activity

Processor: Unknown
Refiner: Unknown

Off-Specification Used Oil Burner:

Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:

Unknown

Marketer who first claims the used oil meets the specifications:

Unknown

Underground Injection Control:

Unknown

Destination Facility for Universal Waste:

Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 43 Managed: 0 Shipped: 43 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
OILY WATER SEPARATOR SLUDGE W/BENZENE, REACTIVE SULFIDES				
17	0		17	H040 - INCINERATION
EPA Waste Codes: D001, D003, D018, F037				
TANK SLUDGE W/ BENZENE				
3	0		3	H040 - INCINERATION
EPA Waste Codes: D018				
USED GASOLINE COALESCING FILTER W/ BENZENE.				
1	0		1	H040 - INCINERATION
EPA Waste Codes: D018				
ABSORBENT, PPE W/HEAT EXCHANGER BUNDLE SLUDGE				
1	0		1	H040 - INCINERATION
EPA Waste Codes: K050				
USED PARTS WASHER KEROSENE W/ LEAD & BENZENE.				
1	0		1	H050 - ENERGY RECOVERY H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008, D018				
FILTERS CONTAMINATED W/ WASTE SULFOLANE & BENZENE				
1	0		1	H040 - INCINERATION
EPA Waste Codes: D018				
SULFOLANE CONTAMINATED W/ BENZENE				
0	0		0	H040 - INCINERATION H050 - ENERGY RECOVERY
EPA Waste Codes: D018				
SORBENT PADS CONTAMINATED W/ FUELS & BENZENE				
0	0		0	H040 - INCINERATION
EPA Waste Codes: D018				
FLUORESCENT LIGHT TUBES W/ MERCURY.				
0	0		0	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D009				

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
SANDBLAST MEDIA CONTAMINATED W/ CADMIUM & LEAD	0	0	0	H111 - STABILIZATION OR CHEMICAL FIXATION

EPA Waste Codes: D006, D008

Activity Location: AK Source Type: Biennial Report Seq. Number: 2 Receive Date: 21 FEB 1996 Report Cycle: 1995

Other/Previous Site Name: MAPCO ALASKA PETROLEUM INC, NORTH POLE

Location 1100 H&H LANE
Address: NORTH POLE, AK 99705

Mailing 1100 H&H LANE
Address: NORTH POLE, AK 99705

Contact Person JOHN A HELLEN
For Source (907) 488-5158
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 32411 Petroleum Refineries

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown
TSD Activity: No
Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Used Oil Processor and/or Re-refiner Activity
Processor: Unknown
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown
Destination Facility for Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 62 Managed: 0 Shipped: 63 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
DESALTER SLUDGE	7	0	7	H061 - FUEL BLENDING
EPA Waste Codes: D018				
USED PETROLEUM FILTERS	1	0	1	H040 - INCINERATION
EPA Waste Codes: D018				
ASH FROM HEATER CLEANING, CHROMIUM	1	0	1	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D007				
HEAT EXCHANGER BUNDLE SLUDGE	0	0	1	H040 - INCINERATION
EPA Waste Codes: K050				
LAB PACK	0	0	0	H129 - OTHER TREATMENT
EPA Waste Codes: D006, D007, D009				

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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FUEL TANK CLEANING SLUDGE

0 0

0 H040 - INCINERATION

EPA Waste Codes: D018

USED SANDBLASTING MEDIA

0 0

0 H111 - STABILIZATION OR CHEMICAL
FIXATION

EPA Waste Codes: D006, D008

IGNITABLE WASTE SOLVENT FROM EQUIPMENT CLEANING; MIXTURE OF TOLUENE AND METHYL ETHYL KETONE

0 0

0 H061 - FUEL BLENDING

EPA Waste Codes: D001, D035, F005

SPENT SULFOLANE

0 0

0 H061 - FUEL BLENDING

EPA Waste Codes: D018

SPENT PAINT THINNER; XYLENE, TOLUENE, NAPHTHALENES, PARAFFINS

0 0

0 H061 - FUEL BLENDING

EPA Waste Codes: D001, F003, F005

Activity Location: AK	Source Type: Biennial Report	Seq. Number: 1	Receive Date: 23 FEB 1994	Report Cycle: 1993
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Other/Previous Site Name: MAPCO ALASKA PETROLEUM INC, NORTH POLE

Location 1100 H&H LANE
Address: NORTH POLE, AK 99705

Mailing 1100 H&H LANE
Address: NORTH POLE, AK 99705

Contact Person KATHLEEN M MCCULLOM
For Source (907) 488-0033
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District:

NAICS Codes: 32411 Petroleum Refineries

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: Unknown

Used Oil Processor and/or
Re-refiner Activity

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used
oil meets the specifications: Unknown

Underground
Injection Control: Unknown

Destination Facility for
Universal Waste: Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 4 Managed: 0 Shipped: 4 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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SPENT SULFOLANE

0 0

0 H061 - FUEL BLENDING

EPA Waste Codes: D018

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)				
Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
OILY WATER SEPARATOR SLUDGE.				
0	0		0	H040 - INCINERATION
EPA Waste Codes: F037				
ABSORBENT WITH WATER AND UNUSED PRODUCT.				
0	0		0	H040 - INCINERATION
EPA Waste Codes: D001, D008				
ABSORBENT AND DEBRIS WITH BROKEN MERCURY THERMOMETERS AND HYDROMETERS.				
0	0		0	H010 - METALS RECOVERY
EPA Waste Codes: D009				
SPENT PAINT THINNER W/ XYLENE, TOLUENE, NAPHTHALENES, PARAFFINS.				
0	0		0	H061 - FUEL BLENDING
EPA Waste Codes: D001, F003, F005				
PAINT: MINERAL SPIRITS, NAPHTHA, ZINC OXIDE, 2-BUTOXYETHANOL.				
0	0		0	H061 - FUEL BLENDING
EPA Waste Codes: D001				

Activity Location: AK Source Type: Implementer Seq. Number: 1 Receive Date: 08 MAY 1992

Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location: 1100 H & H LN
Address: NORTH POLE, AK 99705

Mailing Address: 1100 H & H LN
Address: NORTH POLE, AK 99705

Operator (current): WILLIAMS ALASKA PETROLEUM
From: 01/01/0001 To: 1100 H & H LN
NORTH POLE, AK 99705
Type: Private
Phone:

Land Type: State Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No
TSD Activity: Yes
Recycler Activity: No

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

Processor: No
Refiner: No

Marketer who first claims the used
oil meets the specifications: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Underground
Injection Control: No Destination Facility for
Universal Waste:

* End of Report *

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA COMPLIANCE EVALUATION INSPECTION (CEI)

Facility Name:

Flint Hills Resources Alaska
North Pole Refinery
(formerly William Petroleum)
1100 H & H Lane
North Pole, AK 99705

Date of Inspection: June 17, 2004

Date of Report: September 30, 2004

Facility EPA ID#:

AKD 00085 0701

Standard Industrial Classification:

2911 - Petroleum Refining

Inspection Team Members:

Diane Richardson,
Environmental Protection Specialist
US EPA Region 10
Alaska Operations Office
222 W. 7th Avenue
Anchorage, Alaska 99513
907-271-6329
Richardson.diane@epa.gov

RCRA Status:

Bruce Long,
Environmental Protection Specialist
US EPA Region 10
Oregon Operations Office
811 SW Sixth Avenue
Portland, Oregon 97204
503-326-3686
long.bruce@epa.gov

Facility Contacts:

David Guinn, Environmental Manager

Kevin Badker, Refinery Manager

Allen Lasiter, President Flint Hills

(907) 488-0033

Authority/Purpose:

This inspection was carried out under the authority of Section 3007 of RCRA. The United States Environmental Protection Agency (EPA) intended to secure information regarding Flint Hills North Pole Refinery's compliance with the regulations promulgated under the Resource Conservation and Recovery Act (RCRA) and as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Specifically, regulations found at 40 CFR Part 260 through 270 and Part 279 for the management, transportation, treatment, storage, and disposal of hazardous waste and used oil as defined under these regulations, was investigated.

Facility Description:

Flint Hills Resources, LP is a Wichita, Kansas-based refining and chemicals company that is wholly owned by Koch Industries, Inc. Flint Hills Resources, through its subsidiary Flint Hills Resources Alaska, owns and operates the North Pole facility. The North Pole facility is a 220,000 barrel-per-day crude oil refinery. The North Pole Refinery was purchased from Williams Petroleum in March 2004, and is Alaska's largest and daily produces, about 70,000 barrels of various petroleum products including gasoline, naphtha, jet fuel, heating oil, diesel fuel, gas-oil and asphalt for supply to local and international markets. About 60 percent of the North Pole Refinery's production consists of jet fuel, which is supplied to airlines and to the U.S. military. The company also owns and operates products terminals in Fairbanks and Anchorage that store and distribute asphalt, fuel oils, diesel, jet fuels, gasoline and naphtha refined at the North Pole Refinery.

Refining operations at the North Pole facility consist of three main processes:

Separation occurs at the beginning of the process and following all of the other conversion and treatment processes. Separation is also used to remove oil from wastewater before it is discharged, and to separate gasoline vapors from the air at truck and rail loading.

Conversion involves three different sub-production processes:

- Cracking
- Combining
- Reforming

Treatment is the process of purifying streams to remove unwanted material.

RCRA Compliance History:

An EPA Compliance Evaluation Inspection in 2003 cited violations of universal waste labeling and dates, hazardous waste labels and dates, and open containers.

A new notification of hazardous waste activity was filed with EPA dated 4/7/04. The new waste stream was K052 from an out of service leaded tank that was cleaned. This was a one-time generation notification.

Following are the findings from this inspection (June 17, 2004):

Hazardous waste Streams

Primary RCRA hazardous waste streams are:

- 1) Heat exchanger Solids - K050, which contains lead, nickel and chrome in addition to the petroleum based constituent. Volume varies and is generated once a year during maintenance of the heat exchanges.
- 2) Oil Water Separator sludge - K037, contains a verity of contaminants, none of which fail TCLP. This is a large waste stream and is generated throughout the facility, but the largest volume is from the oil water separator and fixed film stripper that treats waste waters from the process. Waste waters are stored in tank number 192.
- 3) Tank bottoms from crude oil storage - K169, which is generated once every two to three years. The majority of the tank bottoms are returned to the pipeline. However, some volume of solids will remain in the tanks and it would be necessary to remove only when maintenance on the tanks is necessary.
- 4) Various paints, solvents and aerosol cans. The primary waste code used for the disposal of the solids is F003. The aerosol cans are treated on-site and the paint and other solids are accumulated with solvent, such as acetone and disposed as a hazardous waste fuel (shipped to Emerald Environmental Services in Tacoma for fuel blending).
- 5) At the time of this inspection, Flint Hills was crushing their fluorescent bulbs on-site and managing them as a hazardous waste; D009. Due to the shipping costs, it was not an advantage to Flint Hills to manage the lamps as universal waste.

Hazardous waste generated by Flint Hills is sent off-site for disposal and is currently being managed and disposed through Philips Environmental Services. The majority of Flint Hills' hazardous waste is going to the Philips Environmental Services facility in Kent Washington.

Manifest Review

A generator who offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a manifest, form 8700-22. The generator must sign the manifest certification by hand; and obtain the handwritten signature of the initial transporter and date the hazardous waste was accepted for transport. In addition, the generator must retain the original copy of the manifest with the hand written signature of the receiving facility's representative and must retained the document for at least three years from the date the waste was accepted by the initial transporter. In addition, a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within **45** days of the date the waste was accepted by the initial transporter. The following was noted during our review of the manifested shipments that left the facility after EPA's 2003 inspection..

Table 1 is a summary of the sequence of events for each of the three shipments from when the waste left Flint Hills North Pole facility and the manifest with the handwritten signature of the owner or operator of the designated facility was received by Flint Hills.

Table 1

Manifest Number	04084	03008	03221
Shipped	03/29/04	10/29/03	08/07/03
TSDF Rec's Shipment	04/29/04	12/03/03	09/12/03
Flint Rec's Manifest	05/03/03	12/04/03	09/16/03
No. of Days	35	36	40

Each manifest had an LDR notice that accompanied the shipment. No discrepancies were noted.

Maintenance Building No. 209

The maintenance building operates a glass bead blaster. At the time of this inspection there was a 10-gallon container being managed as satellite accumulation. The container was labeled and being managed appropriately. The waste was not leaking, the container was closed and the labeling read satellite accumulation, hazardous waste.

This building also operates a parts washer. At the time of this inspection there was a 10-gallon container labeled as "washer sludge" for the solids out of the parts washer. The container was being managed as satellite accumulation. The container was labeled and being managed appropriately.

In a separate satellite accumulation area was a 55-gallon container labeled as hazardous waste ethylene glycol. In the past, this waste stream has not been hazardous but due to the new ownership of the company, the waste was pending new analysis.

In the same satellite accumulation area as the ethylene glycol was a 20-gallon aerosol can puncturing device and container also being managed as satellite accumulation. There were three empty aerosol cans on top of the puncturing device.

EPA has previously stated that generators can only treat hazardous waste in generator accumulation tanks and containers that are in full compliance with 40 CFR 265 Subparts J and I (51 FR 10145, see page 10168). The requirement under 40 CFR 265 Subparts J and I are designed to ensure that the integrity of the tanks and containers is not breached. EPA considers treatment in accumulation tanks and containers by generators to pose the same level of risk, as would treatment by permitted facilities in similar tanks and containers. Satellite containers are exempt from compliance with the full requirements under Subpart I (40 CFR 262.34(c)). At a minimum for the container being used to treat the aerosol containers must comply with Subpart I (container management) under Part 265, the container must have an accumulation start date and be marked with the words "Hazardous Waste." In addition, there needs to be weekly inspections and the personnel handling the waste must be trained. The container was not dated with an accumulation start date on the day of this inspection. The regulations at 40 CFR 262.34(a) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the waste is placed in containers.

At the time of this inspection, there were three aerosol cans sitting on top of the puncturing device container. EPA has stated that aerosol cans that have not been punctured are considered to be a hazardous waste (D003).

There were also two 55-gallon containers of used oil in this area labeled appropriately.

Building #249

Lead acid batteries in this building are recycled.

The satellite accumulation area had three 55-gallon containers labeled as hazardous waste. One container was for crushing fluorescent lamps, one was a container for puncturing aerosol cans, and the third was labeled as hazardous waste paint waste. Both the lamp crusher and the aerosol can container are considered treatment under RCRA.

The containers were not full at the time of this inspection. The total amount of waste accumulated at this time was below the 55-gallon limit for satellite accumulation areas. EPA has stated that generators can only treat hazardous waste in generator accumulation tanks and containers that are in full compliance with 40 CFR 265 Subparts J and I (51 FR 10145, see page 10168). The requirement under 40 CFR 265 Subparts J and I are designed to ensure that the integrity of the tanks and containers is not breached.

EPA considers treatment in accumulation tanks and containers by generators to pose the same level of risk, as would treatment by permitted facilities in similar tanks and containers. Satellite containers are exempt from compliance with the full requirements under Subpart I (40 CFR 262.34(c)). At a minimum for the containers being used to treat the aerosol cans and fluorescent lamps to comply with Subpart I (container management) under Part 265, the container must have an accumulation start date and be marked with the words "Hazardous Waste." In addition, there needs to be weekly inspections and the personnel handling the waste must be trained. The containers were not dated with an accumulation start date on the day of this inspection.

There was also a 55-gallon container labeled as universal waste bulbs dated 4/1/04. The container was labeled and being managed appropriately.

Lab

The satellite accumulation area inside the lab contained a small jug of spent chemicals from the chemical oxygen demand (COD) test. This solution is hazardous for benzene (D018). The central accumulation area outside the lab is in a yellow tote. Inside the tote at the time of this inspection was a 5-gallon container labeled for mercury waste. The container was empty and no accumulation start date on the container at the time of this inspection.

90-day Outside accumulation area

A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that, the waste is placed in containers and the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container; and while being accumulated on-site, each container is labeled or marked clearly with the words, "Hazardous Waste."

The containers observed in this area at the time of this inspection were:

- five 55-gallon containers labeled as non-hazardous sandblast grit
- a 15-gallon container labeled as "exit sign with tridium" dated 5/3/04

- a 55-gallon container labeled as hazardous waste misc. sludge (K050, F037) dated 6/17/04 (The container wasn't full at the time of this inspection but fills quickly so is managed as a less than 90-day accumulation area.).
- a large tote labeled as hazardous waste spent filters dated 6/17/04

There were lots of empty containers in this area as well.

Fixed Film Stripper and Lagoons:

Hazardous waste waters generated at this facility typically are hazardous for benzene (D018) that comes from the desalting process. Before the waste water goes into the lagoons, 2/3 of the waste waters go through the bio treatment system and one-third of the waste water goes through the waste water system. Each stream has to be below .5ppm for benzene for either to go to the lagoons. If one stream comes back above .5ppm and one comes back below .5ppm, neither stream will go to the lagoon, instead they will both returned back through the system and testing again until both meet the .5ppm limit.

Closing/Summary:

Both Mr. Guinn and Mr. Lasiter represented Flint Hills during the out briefing. The EPA inspection team discussed the rules about generator treatment being managed in a less than 90-day area as opposed to satellite accumulation. This meant that container used to treat hazardous waste must be in compliance with the standards identified for generators containers found at 40 CFR 262.34.

The EPA inspection team also discussed aerosol cans as being a hazardous waste for reactivity (D003) and therefore they needed to be managed in containers that were closed unless waste was being added or removed and the container was labeled as hazardous waste as required at 40 CFR 262.34(a)(3).

This inspection ended at approximately 3:35pm local time.

Recommendations:

Williams operates two small lagoons for capturing waste water from the film stripper and oil water separators throughout the facility. The wastewater, which follows at an average rate of 65-gallons per minute, flows through a series of treatment devices such as a film stripper and the water, then flows in the lagoons before it is discharged to the City of North Pole. Williams monitors the effluent from the stripper only to determine the benzene and sulfalene content. No other hazards are monitored. Further visits by EPA should include an extensive sample collection of the effluent entering the pond to determine if any hazardous waste is being disposed into the ponds.